CONSTRUCTION PERMIT
OFFICE OF AIR MANAGEMENT

Weiss Prestaining, Inc.
3522 South SR 104
Stillwell, Indiana 46350

is hereby authorized to construct

(a) One (1) latex/oil based flow coater, known as Machine #5, exhausted to general ventilation fans 1, 2, 3 and 4, capacity: 7,500 square feet of wood siding panels or boards per hour on latex or 7,000 square feet of wood siding panels or boards per hour on oil.

(b) One (1) oil based/latex flow coater, known as Machine #6, exhausted to Stack V-1 and to general ventilation fans 1, 2, 3 and 4, capacity: 7,000 square feet of wood siding panels or boards per hour on oil or 7,500 square feet of wood siding panels or boards per hour on latex.

(c) One (1) natural gas-fired convection dryer chamber, known as H1, exhausted to general ventilation fans 1, 2, 3 and 4, rated at 4.32 million British thermal units per hour.

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1 and 40 CFR 52.780, with conditions listed on the attached pages.

Construction Permit No.: CP 091-9572-00069	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

Construction Conditions

General Construction Conditions

1. That the data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may affect allowable emissions, the change must be approved by the Office of Air Management (OAM).

2. That this permit to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

3. That pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

4. That pursuant to 326 IAC 2-1-9(b)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. That notwithstanding Construction Condition No. 6, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

First Time Operation Permit

6. That this document shall also become a first-time operation permit pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

   (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the facilities were constructed as proposed in the application. The facilities covered in the Construction Permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

   (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

   (c) Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.

   (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-7-19 (Fees).

   (e) The Permittee has submitted their Part 70 (T 091-7626-00069) application on December 13, 1996 for the existing source. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

7. That when the facility is constructed and placed into operation the following operation conditions shall be met:

Operation Conditions

General Operation Conditions

1. That the data and information supplied in the application shall be considered part of this permit. Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Management (OAM).

2. That the Permittee shall comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder.

Preventive Maintenance Plan

3. That pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plans), the Permittee shall prepare and maintain a preventive maintenance plan, including the following information:

   (a) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices.

   (b) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions.

   (c) Identification of the replacement parts which will be maintained in inventory for quick replacement.

   The preventive maintenance plan shall be submitted to IDEM, OAM upon request and shall be subject to review and approval.

Transfer of Permit

4. That pursuant to 326 IAC 2-1-6 (Transfer of Permits):

   (a) In the event that ownership of the one (1) oil flow coater, one (1) latex coater and one (1) forced air dryer is changed, the Permittee shall notify OAM, Permit Branch, within thirty (30) days of the change. Notification shall include the date or proposed date of said change.

   (b) The written notification shall be sufficient to transfer the permit from the current owner to the new owner.

   (c) The OAM shall reserve the right to issue a new permit.

Permit Revocation

5. That pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

   (a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of 326 IAC 2-1 (Permit Review Rules).

Availability of Permit

6. That pursuant to 326 IAC 2-1-3(l), the Permittee shall maintain the applicable permit on the premises of this source and shall make this permit available for inspection by the IDEM or other public official having jurisdiction.

PSD Synthetic Minor Limit

7. That the input of volatile organic compounds to Machines 5 and 6 shall be limited to a total of 249 tons per year, rolled on a monthly basis. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply. During the first 12 months of operation, VOC usage shall be limited such that the total VOC used divided by the accumulated months of operation shall not exceed the limit specified.

Annual Emission Reporting

8. That pursuant to 326 IAC 2-6 (Emission Reporting), the Permittee must annually submit an emission statement for the source. This statement must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. A copy of this rule is enclosed. The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31.

Volatile Organic Compound

9. That pursuant to 326 IAC 2-1-3(i)(8), records of surface coating quantities and organic solvent contents shall be maintained for a minimum period of 36 months and made available upon request of the Office of Air Management (OAM). Any change or modification which may increase potential emissions to250 tons per year from the equipment covered in this permit shall obtain a PSD permit pursuant to 326 IAC 2-2 before such change may occur.

BACT Conditions

10. That pursuant to 326 IAC 8-1-6, BACT is:

(a) The as-installed flow coating machines with a high transfer efficiency.

(b) A VOC emission limit of 249 tons per twelve (12) consecutive month period.

(c) A maximum VOC coating content not to exceed 5.98 pounds per gallon less water. If a coating exceeds 5.98 pounds per gallon less water then compliance shall be determined on a daily volume weighted average basis.

(d) All stains and latex coatings shall not exceed a maximum VHAP content of (1.0) pound VHAP per pound solid, as applied.

(e) The preparation and maintenance of a written work practice implementation plan within sixty (60) calendar days after permit issuance. The work practice implementation plan must define environmentally desirable work practices for each wood coating manufacturing operation and at a minimum address each of the following work practice standards:

(1) Operator training course.

(2) Leak inspection and maintenance plan.

(3) Flow coating machine cleaning.

(4) The cleanup solvent containers used to transport solvent from drums to work stations be closed containers having soft gasketed closures.

(5) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize spillage on the floor and over application.

(6) Storage containers used to store VOC and/or HAPS containing materials shall be kept covered when not in use.

(7) Cleanup solvents will be reused in the process as much as possible to reduce hazardous waste and the related impact on the environment.

(8) Odd lot/batch overrun coatings will be reused as much as possible to reduce hazardous waste and the related impact on the environment.

Record Keeping and Reporting Requirements

11. That a log of information necessary to document compliance with operation permit condition no. 7 shall be maintained. These records shall be kept for at least the past 36-month period and made available upon request to the Office of Air Management (OAM).

(a) A quarterly summary shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within 30 days after the end of the quarter being reported in the format attached. These records shall include the coating, thinner and clean up solvent usage, material safety data sheet (MSDS) and the date of use.

(b) Unless otherwise specified in this permit, any notice, report, or other submissions required by this permit shall be timely if:

(i) The date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due.

(ii) If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due

(c) All instances of deviations from any requirements of this permit must be clearly identified in such reports.

(d) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be clearly identified in such reports.

(e) The first report shall cover the period commencing the postmarked submission date of the Affidavit of Construction.

Open Burning

12. That the Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6.

Emergency Reduction Plans

13. Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within 180 calendar days from the issuance date of this permit.

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. If after this time, the Permittee does not submit an approvable ERP, IDEM, OAM, shall supply such a plan.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate level. [326 IAC 1-5-3].

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Quarterly Report

Source Name: Weiss Prestaining, Inc.
Source Address: 3522 South SR 104, Stillwell, Indiana 46350
Mailing Address: P.O. Box 650, North Liberty, Indiana 46554
Permit No.: CP: 091-9572-00069
Facility: Machine 5 and Machine 6
Parameter: VOC
Limit: 249 tons per twelve (12) consecutive month period total from both machines

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for New Construction and Operation

Source Background and Description

Source Name:	**Weiss Prestaining, Inc.**
Source Location:	**3522 South SR 104, Stillwell, Indiana 46350**
County:	**LaPorte**
Construction Permit No.:	**CP 091-9572-00069**
SIC Code:	**2499**
Permit Reviewer:	**Mark L. Kramer**

The Office of Air Management (OAM) has reviewed an application from Weiss Prestaining, Inc. relating to the modification of an existing permitted exterior wood siding painting and staining source, consisting of the following equipment:

(a) One (1) latex/oil based flow coater, known as Machine #5, exhausted to general ventilation fans 1, 2, 3 and 4, capacity: 7,500 square feet of wood siding panels or boards per hour on latex or 7,000 square feet of wood siding panels or boards per hour on oil.

(b) One (1) oil based/latex flow coater, known as Machine #6, exhausted to Stack V-1 and to general ventilation fans 1, 2, 3 and 4, capacity: 7,000 square feet of wood siding panels or boards per hour on oil or 7,500 square feet of wood siding panels or boards per hour on latex.

(c) One (1) natural gas-fired convection dryer chamber, known as H1, exhausted to general ventilation fans 1, 2, 3 and 4, rated at 4.32 million British thermal units per hour.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{E}F)
V-1 (Horz)	Machine #6	20	2.26	3,420	ambient

Enforcement Issue

There are no enforcement actions pending this source.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Information, unless otherwise stated, used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on March 16, 1998, with additional information received on June 1 and 22, as well as on September 14, 17 and 23, 1998.

Emissions Calculations

See Appendix A pages 1 through 3 of 3 (Emissions Calculation Spreadsheets) for detailed calculations. The worst case potential VOC emissions are calculated assuming Machines 5 and 6 are using oil based materials. However, the worst HAPS calculations use the HAPS from Machine 5 on latex and Machine 6 on oil based materials since the latex materials have the majority of the HAPS and both machines can not use latex.

Total Potential and Allowable Emissions

Indiana Permit Allowable Emissions Definition (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

Pollutant	**Allowable Emissions** (tons/yr)	**Potential Emissions** (tons/yr)
Particulate Matter (PM)	0.226	0.226
Particulate Matter (PM_{10})	0.226	0.226
Sulfur Dioxide (SO_2)	0.011	0.011
Volatile Organic Compounds (VOC)	2,091*	2,091
Carbon Monoxide (CO)	0.396	0.396
Nitrogen Oxides (NO_x)	1.88	1.88
Single Hazardous Air Pollutant (HAP)	72.1	72.1
Combination of HAPS	119	119

(a) The potential emissions before control are equal to the allowable emissions, therefore, the potential emissions before control are used for the permitting determination.

(b) Allowable emissions (as defined in the Indiana Rule) of volatile organic compounds (VOC) are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.

(c) Allowable emissions (as defined in the Indiana Rule) of a single hazardous air pollutant (HAP) are greater than 10 tons per year and the allowable emissions of any combination of the HAPS are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, a construction permit is required.

* The VOC emissions will be limited to 249 tons per year to avoid the applicability of 326 IAC 2-2 (PSD).

County Attainment Status

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_X) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. LaPorte County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_X emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) LaPorte County has been classified as attainment or unclassifiable for the remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	**Emissions** (tons/yr)
PM	0.047
PM_{10}	0.047
SO_2	0.002
VOC	194
CO	0.083
NO_X	0.394

(a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

(b) These emissions were based on CP 091-5008-00069 issued September 16, 1996.

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (tons/yr)	PM_{10} (tons/yr)	SO_2 (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NO_X (tons/yr)
Proposed Modification	0.226	0.226	0.011	249	0.396	1.88
PSD or Offset Threshold Level	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source has submitted their Part 70 (T-091-7626-00069) application on December 13, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

Federal Rule Applicability

There are no New Source Performance Standards (326 IAC 12) and 40 CFR Part 60 applicable to this facility.

There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) 40 CFR Part 63 applicable to this facility.

NESHAP Subpart JJ applies to wood furniture manufactured under SIC codes of 2434, 2511, 2512, 2517, 2519, 2521, 2531, 2541, 2599 or 5712. Since this source coats exterior wood siding and has a SIC code of 2499, Subpart JJ does not apply.

State Rule Applicability

326 IAC 2-1-3.4 (New source toxics control)

This rule is applicable to this modification because the proposed modification to an existing source has the capability to produce finished products and worst case limited HAPS are major; a single HAP greater than ten (10) tons per year and the combination of all HAPS are greater than twenty-five (25) tons per year. The source reviewed the U.S. EPA RACT/BACT/LAER Clearinghouse (RBLC) data base of determinations for similar wood coating sources of toxics. In addition, recent IDEM BACT determinations of sources with similar SIC codes were also evaluated. The RBLC and IDEM BACT determinations for operations similar to those performed at Weiss Prestaining consisted of pollution prevention practices combined with water-borne coatings and high transfer efficiency applicators. In addition, U.S. EPA RTP was contacted regarding Section 112(g) for the wood building products industry. U.S. EPA indicated that they expected to promulgate a standard requiring water-borne coatings, but no add-on controls. VOCs are limited to 249 tons per twelve (12) consecutive month period and the combination of HAPs will be reduced to 96.6 tons per year as shown in Appendix A when assuming full potential VOC and HAPs emissions from one (1) machine on latex and the

remainder of the 249 tons per year VOC emissions are from the other machine on stain. If both machines were to use latex only the potential VOC and HAPs emissions would be 186 tons per year. If both machines were to use stain only, and met the VOC limit of 249 tons per year, the HAPs emissions would only be 6.2 tons per year.

In addition Weiss Prestaining shall use finishing materials in which all stains and latex coatings have a maximum VHAP content of (1.0) pound VHAP per pound solid, as applied.

326 IAC 2-2 (Prevention of Significant Deterioration)

The source has accepted a limit of 249 tons per twelve (12) consecutive month period of VOC delivered to the applicators of Machines 5 and 6. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

326 IAC 2-6 (Emission Reporting)

This facility is subject to 326 IAC 2-6 (Emission Reporting), because the source emits potentially more than 100 tons per year of VOC in LaPorte County. Pursuant to this rule, the owner/ operator of this facility must annually submit an emission statement of the facility. The annual statement must be received by July 1 of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4.

326 IAC 8-1-6 (New facilities; general reduction requirements)

Since this proposed modification has the potential to emit more than twenty-five (25) tons per year of VOC, 326 IAC 8-1-6 is applicable. The best available control technology (BACT) analysis examined four add-on controls versus a 249 ton per year limit without add-on controls. This VOC limit is equivalent to an eighty-eight (88) percent reduction from the potential VOC emissions of 2,091 tons per year. The four (4) control technologies were: regenerative and recuperative thermal oxidation as well as zeolite and carbon concentrators with oxidizers. BACT for this modification was determined to be a combination of work practices, high transfer efficiency coating equipment, limits on both the annual usage and maximum VOC content of the coatings and a VOC emission limit of 249 tons twelve (12) consecutive month period. The maximum VOC content of the coating will not exceed 5.98 pounds per gallons less water on a weekly volume weighted average basis and all stains and latex coatings shall not exceed a maximum VHAP content of (1.0) pound VHAP per pound solid, as applied.

The following work place practices will be followed. Weiss Prestaining, Inc, owner of Machines 5 and 6, shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after permit issuance. The work practice implementation plan must define environmentally desirable work practices for each wood coating manufacturing operation and at a minimum address each of the following work practice standards:

(a) Operator training course.

(b) Leak inspection and maintenance plan.

(c) Flow coating machine cleaning.

(d) The cleanup solvent containers used to transport solvent from drums to work stations be closed containers having soft gasketed closures.

(e) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize spillage on the floor and over application.

(f) Storage containers used to store VOC and/or HAPS containing materials shall be kept covered when not in use.

(g) Cleanup solvents will be reused in the process as much as possible to reduce hazardous waste and the related impact on the environment.

(h) Odd lot/batch overrun coatings will be reused as much as possible to reduce hazardous waste and the related impact on the environment.

BACT will also satisfy MACT.

326 IAC 8-2-10 (Flat wood panels: manufacturing operations)

Since this coating source manufactures exterior wood siding, pursuant to 326 IAC 8-2-10(b) this modification is exempt from this rule.

326 IAC 8-2-12 (Wood furniture and cabinet coating)

Since this source does not surface coat wood furnishings defined as kitchen, bath or vanity cabinets, tables, beds , chairs, sofas, art objects or other solid wood, wood composition or simulated wood material furnishing, 326 IAC 8-2-12 is not applicable to this source which coats exterior siding.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

(a) This proposed modification will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act. The concentrations of these air toxics were modeled and found to be (in worst case possible) as follows: The concentrations of these air toxics were compared to the Permissible Exposure Limits (PEL) developed by the Occupational Safety and Health Administration (OSHA). The Office of Air Management (OAM) does not have at this time any specific statutory or regulatory authority over these substances.

(b) The applicant has been notified in writing that the air toxic emissions exceed the major source applicability levels stated by Section 112 of the Clean Air Act Amendments, and that it would be beneficial, both to the applicant and to the public, for the applicant to take steps to reduce or eliminate these air toxic emissions.

(c) See attached spreadsheets for detailed air toxic calculations.

Conclusion

The construction of the one (1) oil flow coater, one (1) latex coater and one (1) forced air dryer will be subject to the conditions of the attached proposed **Construction Permit No. CP 091-9572-00069.**

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for New Construction and Operation

Source Name: **Weiss Prestaining, Inc.**
Source Location: **3522 South SR 104, Stillwell, Indiana 46350**
County: **LaPorte**
Construction Permit No.: **CP 091-9572-00069**
SIC Code: **2499**
Permit Reviewer: **Mark L. Kramer**

On October 24, 1998, the Office of Air Management (OAM) had a notice published in the News Dispatch and LaPorte Herald-Argus, Michigan City and LaPorte, Indiana, stating that Weiss Prestaining, Inc. had applied for a construction permit to construct and operate an existing permitted exterior wood siding painting and staining source. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On November 10, 1998, Robert D. Waugaman of Bruce Carter on behalf of Weiss Prestaining, submitted comments on the proposed construction permit. The comments and corresponding responses are as follows: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

Comment 1:

Operation Condition 11, Reporting Requirements, contains both record keeping requirements and reporting requirements. For purposes of clarification, Weiss requests that these topics be in separate conditions. The first paragraph requires "that a log of information necessary to document compliance with operation permit condition no. 7 shall be maintained" and retained for 36 months. This is a record keeping requirement. The last sentence in 11(a) requires that "these reports shall include the coating, thinner and clean up solvent usage, material safety data sheet (MSDS) and the date of use." The copies of the MSDS and record of when the material was used should be record keeping requirements. In the past, IDEM has not wanted copies of MSDS submitted with quarterly reports. Also, Weiss requests that the reference to "date of use" be changed to "month of use."

Response 1:

Operation Condition 11 contains both record keeping and reporting requirements and therefore the title of this condition has been changed. In addition, the word “reports” has been changed to “records” in the last sentence of part (a).

The request to change the time frame from “date” to “month” of use can not be accommodated because the source must be able to verify that a maximum VOC coating content on a weekly volume weighted average basis did not exceed 5.98 pounds per gallon, less water as specified in Condition 10(c).

Record Keeping and Reporting Requirements

11. That a log of information necessary to document compliance with operation permit condition no. 7 shall be maintained. These records shall be kept for at least the past 36-month period and made available upon request to the Office of Air Management (OAM).

(a) A quarterly summary shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within 30 days after the end of the quarter being reported in the format attached. These ~~reports~~ **records** shall include the coating, thinner and clean up solvent usage, material safety data sheet (MSDS) and the date of use.

Comment 2:

Operation Condition 11(b) should be reworded to reflect more recent IDEM language which allows for proof of delivery using other carriers, such as UPS and FedEx:

(b) Unless otherwise specified in this permit, any notice, report, or other submissions required by this permit shall be timely if:

(i) The date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due.

(ii) If the document is submitted by any other means, shall be considered timely if it is received and stamped by IDEM, OAM on or before the date it is due.

Response 2:

As suggested, Operation Condition 11(b) has been changed as follows:

(b) Unless otherwise specified in this permit, any notice, report, or other submissions required by this permit shall be timely if:

(i) ~~Delivered by U.S. mail and postmarked on or before the date it is due; or~~
The date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due.

(ii) ~~Delivered by any other method if it is received and stamped by IDEM, OAM, on or before the date it is due.~~
If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

Upon further review, the OAM has decided to make a change in Operation Condition 10(c) because LaPorte County exceeds current ozone standards:

10(c) A maximum VOC coating content not to exceed 5.98 pounds per gallon less water ~~on a weekly volume weight average basis~~**. If a coating exceeds 5.98 pounds per gallon less water then compliance shall be determined on a daily volume weighted average basis.**

Appendix A: Potential Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Weiss Prestaining, Inc.
Address City IN Zip: 3522 South SR 104, Stillwell, Indiana 46350
CP: 091-9572
Plt ID: 091-00069
Reviewer: Mark L. Kramer
Date Received: March 16, 1998

Material	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential tons per year	lb VOC /gal solids	Transfer Efficiency
Machine 5 (F)																
Pit Lock / Tannin Block (54600)	9.88	51.59%	47.7%	3.89%	56.64%	38.80%	0.00571	7500.0	0.89	0.38	16.46	395.02	72.09	0.00	0.99	100%
Machine Coat White Birch (54641)	10.70	53.48%	51.87%	1.61%	59.09%	46.52%	0.00364	7500.0	0.42	0.17	4.70	112.87	20.60	0.00	0.37	100%
Machine 6 (G)																
Mc Alkyd Primer (54681)	10.53	30.40%	0.00%	30.40%	0.00%	69.60%	0.00513	7000.0	3.20	3.20	114.95	2758.85	503.49	0.00	4.60	100%
Mineral Spirits (8052-41-3)	6.58	100.00%	0.00%	100.00%	0.00%	0.00%	0.00057	7000.0	6.58	6.58	26.25	630.10	114.99	0.00		100%
Ready to Spray (R-T-S)*	**10.14**	**34.92%**	**0.00%**	**34.92%**	**0.00%**	**62.64%**	**0.00570**	**7000.0**	**3.54**	**3.54**	**141.21**	**3389.08**	**618.51**	**0.00**	**5.65**	**100%**
OR																
S/T Oil Stain-High VOC (51100)	8.33	71.00%	0.00%	71.00%	0.00%	15.00%	0.00513	7000.0	5.91	5.91	212.38	5097.18	930.24	0.00	39.43	100%
Mineral Spirits (8052-41-3)	6.58	100.00%	0.00%	100.00%	0.00%	0.00%	0.00057	7000.0	6.58	6.58	26.25	630.10	114.99	0.00		100%
Ready to Spray (R-T-S)*	**8.16**	**73.34%**	**0.00%**	**73.34%**	**0.00%**	**13.50%**	**0.00570**	**7000.0**	**5.98**	**5.98**	**238.64**	**5727.29**	**1045.23**	**0.00**	**44.30**	**100%**
AND																
Mineral Spirits (8052-41-3)	6.58	100.00%	0.0%	100.0%	0.0%	0.00%	0.000003	7000.0	6.58	6.58	0.14	3.32	0.61	0.00	n/a	100%
State Potential Emissions			**Add worst case coating to all solvents and both machines on oil**								**477.41**	**11457.89**	**2091.07**	**0.00**		

*** R-T-S maximum potential is used for summing of all VOC, not individual components**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used
RTS Density (lbs/gal) = ((Density(lb/gal)a * Gal of Material (gal/unit)a) + (Density(lb/gal)b * Gal of Material (gal/unit)b)) / (Gal of material (gal/unit)a + Gal of Material (gal/unit)b)
RTS Weight % H2O + Organics = ((Weight % Organics)a * Density (lb/gal)a * Gal of Material (gal/unit)a) + ((Weight % Organics)b * Density (lb/gal)b * Gal of Material (gal/unit)b) / ((Density (lb/gal)a * Gal of Material (gal/unit)a)+(Density (lb/gal)b * Gal of Material (gal/unit)b))

HAP Emission Calculations

Company Name: Weiss Prestaining, Inc.
Plant Location: 3522 South SR 104, Stillwell, Indiana 46350
CP: 091-9572
Plt ID: 091-00069
County: LaPorte
Permit Reviewer: Mark L. Kramer
Date Received: March 16, 1998

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Benzene	Weight %	Weight % Glycol Ethers	Weight % Ethylene Glycol	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	Benzene Emissions (tons/yr)		Glycol Ethers Emissions (tons/yr)	Ethylene Glycol Emissions (tons/yr)
Pit Lock / Tannin Block (54600)	9.88	0.005710	7500.00	0.00%	0.00%	0.00%		0.00%	3.89%	0.00	0.00	0.00		0.00	72.09
Machine Coat White Birch (54641)	10.70	0.003640	7500.00	0.00%	0.00%	0.00%		1.61%	0.00%	0.00	0.00	0.00		20.60	0.00
Mc Alkyd Primer (54681)	10.70	0.005130	7000.00	0.88%	0.48%	0.19%		0.00%	0.00%	14.81	8.08	3.20		0.00	0.00
Mineral Spirits (8052-41-3)	6.58	0.000570	7000.00	0.00%	0.00%	0.00%		0.00%	0.00%	0.00	0.00	0.00		0.00	0.00
OR															
S/T Oil Stain-High VOC (51100)	8.33	0.005130	7000.00	0.00%	0.00%	0.00%		0.00%	0.00%	0.00	0.00	0.00		0.00	0.00
Mineral Spirits (8052-41-3)	6.58	0.000570	7000.00	0.00%	0.00%	0.00%		0.00%	0.00%	0.00	0.00	0.00		0.00	0.00
AND															
Mineral Spirits (8052-41-3)	6.58	0.000003	7000.00	0.00%	0.00%	0.00%		0.00%	0.00%	0.00	0.00	0.00		0.00	0.00

Total State Potential Emissions

	TOTAL HAPs:	(tons/yr):
Machine 5	On Latex	92.69
Machine 6	On Oil	26.09
	5 and 6	118.78

TOTALS:	(tons/yr):	14.8	8.078	3.20		20.6	72.1
	(lb/hr):	3.38	1.84	0.730		4.70	16.5
	(g/sec):	0.426	0.232	0.092		0.593	2.07

Machine 5	On Latex	(tons/yr):	0.00	0.00	0.00		20.60	72.09
Machine 6	On Oil	(tons/yr):	14.81	8.08	3.20		0.00	0.00

Limited	HAPs:	(tons/yr):	2.21	1.21	0.48		20.60	72.09

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emission Calculations
Natural Gas Combustion Only
MM Btu/hr 0.3 - < 10
Commercial Boiler

Company Name: Weiss Prestaining, Inc.
Address City IN Zip: 3522 South SR 104, Stillwell, Indiana 46350
CP: 091-9572
Plt ID: 091-00069
Reviewer: Mark L. Kramer
Date: March 16, 1998

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
4.3	37.7

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	12.0	12.0	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.226	0.226	0.011	1.883	0.100	0.396

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low NOx Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton